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November 22, 2023

***Via ECF***

Hon. Vernon S. Broderick, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

*Re: Goidel et al. v. Aetna Life Insurance Co.*, No. 21-cv-7619

Your Honor:

Pursuant to the Court's order (Dkt. 76), we write on behalf of all parties with the status of settlement discussions. Settlement discussions continue to be productive and we are scheduled for a mediation with former Magistrate Judge Steven M. Gold on December 11, 2023. We jointly request an extension of the stay until December 22, 2023 to prepare the settlement agreement and motion for preliminary approval. To the extent that the parties are unable to agree on a final settlement agreement, the parties further agree that Plaintiffs shall not be prejudiced by this stay, including that Defendant shall not raise any arguments in opposition to class certification that would not have been available to them on June 30, 2023.

The parties respectfully ask the Court to so order this request.

Sincerely,

/s/  
\_\_\_\_\_  
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/s/  
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**APPLICATION GRANTED**  
**SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J.** 11/28/2023

This action is hereby STAYED until December 22, 2023.  
The parties shall provide an update on the status of  
settlement discussions by December 22, 2023.